

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**
Caption in Compliance with D.N.J. LBR 9004-2(c)

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In Re:

ARMANDO R MONCADA

Case No. 15-18825

Judge: JKS

Chapter: 13

CHAPTER 13 DEBTOR'S ATTORNEY CERTIFICATION IN OPPOSITION

1. The debtor's attorney in this case opposes the following (choose one):

☐ Motion for Relief from the Automatic Stay filed by creditor,

A hearing has been scheduled for _____, at _____.

☐ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for _____, at _____.

☒ Certification of Default filed by Marie Ann Greenberg, Trustee.

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (choose one):

☐ Payments have been made in the amount of \$ _____, but have not been accounted for. Documentation in support is attached.

☐ Payments have not been made for the following reasons and debtor proposes repayment as follows (explain your answer):

☒ Other (explain your answer): The debtor resolved a motion for relief from the automatic stay filed by the mortgage company on April 13, 2017. The resolution provides the debtor with an extension of time to obtain a loan modification until June 15, 2017. The debtor is actively involved in a loan modification application and we respectfully request that the Court schedule a hearing on this matter.

DATED: April 18, 2017

/s/David Beslow
Attorneys for Debtor

NOTE:

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.